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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

OPPOSITION OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DAVID POPKIN
TO COMPEL A RESPONSE TO DBP/USPS-141
(January 17, 2002)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this opposition to the January 10, 2002, motion of David Popkin seeking to compel a response to DBP/USPS-141.

Like interrogatory DBP/USPS-136(a), which is currently the subject of motion practice, this interrogatory seeks an explanation of the differences in the Postal Service's application of the Domestic Mail Classification Schedule wording regarding the handling of the First-Class Mail subclasses that result in different service standards for (a) the Letters and Sealed Parcels and the Cards subclass and (b) Priority Mail.

Mr. Popkin's argument in support of his January 10, 2002, motion to compel a response to DBP/USPS-141 appears to be identical in all substantial respects to his argument in support of his January 4, 2002, motion to compel response to DBP/USPS-136(d-f). The Postal Service has reviewed the pleadings related to the dispute concerning DBP/USPS-136(d-f) and has determined that the arguments advanced in its January 10, 2002, opposition to Mr. Popkin's aforementioned January 4, 2002, motion also justify a denial of Mr. Popkin's December 10, 2002, motion to compel a response to DBP/USPS-141.

Accordingly, in response to the motion to compel a response to DBP/USPS-141, the Postal Service invites the Commission to review the arguments advanced in its December 10, 2002, opposition to the motion to compel a response to DBP/USPS-136(d-f).

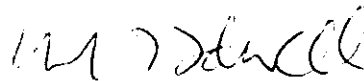
For those reasons, the motion to compel a response to DBP/USPS-141 should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

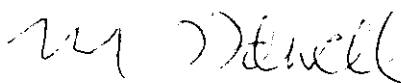
Daniel J. Foucheaux, Jr.
Chief Counsel
Ratemaking



Michael T. Tidwell
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.



Michael T. Tidwell

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January 17, 2002